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Prepped by Ollie Stewart

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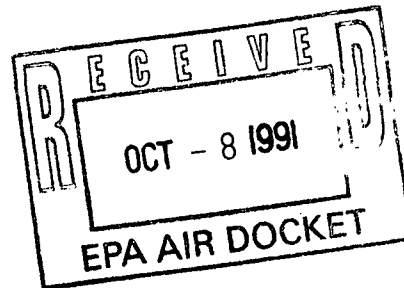
A-91-46

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October 1, 1991

U.S. Environmental Protection Agency
Public Docket A-91-46
Air Docket (LE-131)
401 M Street, S.W., Room M-1500
Washington, DC 20460



To Whom It May Concern:

Bloomfield Refining Company, a subsidiary of Gary-Williams Energy Corporation, supports Ethyl Corporation's fuel additive waiver petition for use of MMT, a manganese-based anti-knock and octane booster.

Bloomfield Refining currently uses neat MMT (i.e., HiTec 3000) in its regular leaded gasoline production, which is currently approximately 25% of total demand in our marketing area. We believe that with the impending gasoline reformulation requirements that MMT usage in all grades of gasoline will help reduce the large capital requirements of reformulation or alternatively minimize reduction in total gasoline production capability. We believe that Ethyl Corporation has gone the extra mile to insure that no negative environmental impact from the use of HiTec 3000 in unleaded gasoline will occur.

Sincerely yours,

GARY-WILLIAMS ENERGY CORPORATION

A. Joe Warr
Sr. Vice President

AJW/aee/03

cc: Mary T. Smith, Director Field Operations & Support Division (EN 397F)
U.S. Environmental Protection Agency

David C. Wilson
Ethyl Canada Inc.